

**Testimony of
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House Committee on Homeland Security Subcommittee on Emergency
Communications, Preparedness, and Response
on
the Future of FEMA Grant's Program Directorate
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Good morning Mr. Chairman and members of the Subcommittee. I want to thank you for the opportunity to testify on the important subject of the future of the Federal Emergency Management Agency's (FEMA) Grant Programs Directorate (GPD). My name is MaryAnn Tierney and I am the Director of Emergency Management in the City of Philadelphia. I have been in this position since November 2006. Prior to that, I was the Assistant Commissioner for Planning and Preparedness with the New York City Office of Emergency Management where I worked from 1999 until 2006. Attached to this testimony is a detailed biography for your reference. Today I am going to discuss with you the need for coordination and consistency in the grant-making process as well as the potential role of FEMA Regional Offices in this process. Additionally, I will provide testimony on specific aspects of the Homeland Security Grant Program (HSGP) managed by the GPD. Lastly, I will explain how the Philadelphia Urban Area Workgroup (UAWG) sets priorities and will highlight a project that has been funded by the HSGP. To the extent possible given regulatory and / or statutory constraints, Federal departments, State Administrative Agents (SAA), and applicants should coordinate their efforts at every step of the grant-making process to more effectively prepare the Nation to prevent, respond to, recover from, and mitigate threats and risks.

At the Federal level this should involve coordinating the development of grant guidance between agencies like the Department of Homeland Security (DHS), the Department of Health and Human Services (DHHS), and the Department of Justice (DOJ) to ensure that funding supports national homeland security and emergency preparedness priorities and is complementary towards one another. Additionally, during the grant application review process, jurisdictions or their component agencies should be required to detail all actual or potential funding sources. Applicants seeking multiple funding sources should be reviewed through an interagency process to ensure funds are not working at crosspurposes nor are duplicative.

I have attached to my testimony a copy of the "Interagency Report on Preparedness Grant Programs." This report was provided to Congress by FEMA in May 2009. While I find the entire report to be an excellent roadmap to improving the grant-making process, I want to draw your attention to the following recommendations:

- Recommendation 4: Coordinate across Federal agencies during program

development to set clear, coordinated goals for preparedness-related programs that a) support recipients' development of clearly defined goals and milestones for use of awarded funds and b) facilitate the measurement of recipient performance and program outcomes.

- Recommendation 5: Coordinate across Federal agencies to a) apply consistent evaluation standards to the evaluation of program progress and end results, and b) account for the resources and effort needed to sustain capabilities.
- Recommendation 8: Federal agencies should improve pre-award information sharing about requested, pending, and awarded grants to facilitate greater transparency of programs, reduce the data entry burden for applicants and recipients, and allow awarding agencies to make more informed allocation decisions.
- Recommendation 9: Congress should authorize Federal agencies to streamline the grants coordination process through official agreements such as Memorandums of Understanding.
- Recommendation 11: Coordinate across Federal agencies administering relevant homeland security programs to agree on the use of a standardized format and structure for guidance and reporting requirements, specifically inclusion in guidance of (a) an acronym and definition list, (b) clear language defining application, reporting, and performance expectations, and (c) a multi-agency list of relevant homeland security grant programs.
- Recommendation 12: Coordinate across Federal agencies to provide a consolidated public resource of information related to homeland security grant programs such as application forms, reporting materials, and program requirements. If this capability is not developed in Grants.gov, departments that administer relevant grant programs should provide on their public web site a consolidated source of related grant program information, including all relevant resources on Grants.gov, guidance, application and reporting requirements, related documentation, and systems used by recipients to submit this information. Similarly, the SAAs for different grant funding streams should be required by their funders to meet, discuss, and develop multi-agency state strategies as well as conduct an

interagency process to review applications and monitor program and project implementation. Lastly, applicants should be required to undergo similar coordination activities in the development of applications and in the implementation phase of programs and projects.

For example, equipment purchased, regardless of funding source, should be governed by similar requirements, such as by requiring all grant funding sources utilize the Interagency Advisory Board Standardized Equipment List (SEL) or the DHS Authorized Equipment List (AEL). The DHS AEL identifies which equipment may be purchased utilizing DHS grant funding and ensures that equipment purchased meets specific standards. The use of standards ensures equipment can be made interoperable. This is especially important when equipment is highly technical, such as communications equipment. Currently, the use of such a list is not required by all Federal departments' homeland security or emergency preparedness grant programs. This can result in purchasing communications equipment with one grant that does not meet industry standards for interoperability and therefore cannot work with communications equipment purchased with another grant.

Recommendation 10 of the "The Interagency Report on Preparedness Grant Programs" supports this by stating, "Federal agencies should work jointly to develop robust national standards for describing the functionality and performance characteristics of preparedness resources and capabilities for use by relevant homeland security grant programs to enable cross-program coordination." I do not advocate handing over the grant-making process to FEMA Regional Offices. This will result in a haphazard and disjointed system that will frustrate SAAs and applicants alike. I do believe that FEMA Regional Offices properly staffed and with adequate support from GPD, could add substantial value. FEMA Regional Offices provide an opportunity to enhance the grant-making process on a micro-level. However, this must be coupled with centralized management and macrolevel coordination across regions. It is important that the grant-making process be centrally managed, with input from FEMA Regional Offices, to ensure consistency. FEMA Regional Offices should serve as conveners and facilitators for many of the multiparty coordination groups I described above during various steps of the grant-making process. Additionally, FEMA Regional Offices maintain the day-to-day relationships

with stakeholders and should serve as the primary point of contact for grants, provided there is centralized management and monitoring of policy interpretation and implementation. A tool to ensuring consistent application of policy would be to develop and provide implementation guidance and options that creates boundaries for FEMA Regional Offices to operate in and allows for flexibility to accommodate the many unique needs of applicants. Similar implementation guidance and options should be provided to SAAs to ensure grant programs are being implemented as intended and consistently within a State. Recommendation 13 of the “The Interagency Report on Preparedness Grant Programs” supports this by stating, “Federal agencies should provide more consistent training and technical assistance offerings to recipients and Federal staff who administer programs in the areas of technical / information technology needs (e.g., Grants.gov training) and grants management (e.g., program management), including sharing of best practices within and across programs and agencies.” I would like to now turn from policy and process-oriented comments to specific aspects of GPD managed grants. GPD should be commended for issuing Information Bulletin 336, which provided a policy for utilizing grant funds for sustainment. The policy is logical and balanced. GPD should revise Information Bulletin 329 and develop a more manageable process for environmental and historic preservation review. The policy adopted is similar to the one utilized by another FEMA grant program – the Public Assistance Program. Since the Public Assistance Program typically involves construction projects, a very rigorous process is in place to ensure environmental and historic preservation considerations are addressed. Construction is not an allowable activity under HSGP, and most projects involve equipment purchases and professional services. Projects funded over multiple grant periods should be addressed. Currently, projects can be multi-year within a given grant period, but it is as if a wall exists at the end of that grant period and a project is assigned an artificial end date that may not match the actual end date of the project. This prevents applicants from the kind of strategic thinking many in the field advocate for.

The last specific component of HSGP I want to address is funding for Management and Administration (M&A). The Philadelphia Urban Area utilizes M&A funds to properly manage the tens of millions of dollars that are received. This includes having professional staff on hand to manage the work of the UAWG and assist stakeholders with managing and executing projects as well as retaining a fiscal agent to ensure that grant

reporting requirements are met and grant funds are spent appropriately.

Organizations like this cannot function like a mom-and-pop pizza shop. In business terms, they are multi-million dollar operations that require competent staff and robust systems. To provide perspective, in any given year at least three grant periods are open. For the Philadelphia Urban Area, that can mean juggling up to \$60 million dollars in various stages of being utilized, from bidding to closeout. It is essential that M&A funding be in place to ensure an operation like this does not falter, and that the funding equal the need to manage the many programs and projects as well as the back-office activities that bring those programs and projects to fruition. With all that said, I want to emphasize that grants programs like those managed by the GPD provide an enormous opportunity to improve preparedness. I have seen first-hand the incredible leaps forward that have been made to build capabilities in a thoughtful and judicious manner. The Philadelphia UAWG is organized around discipline-specific workgroups that develop and execute projects and an Executive Board that provides oversight and coordination. The annual HSGP application is developed through a process that emphasizes building on existing programs and projects, while allowing for worthwhile innovations to surface and receive funding. The Executive Board aligns its priorities with national priorities and prioritizes funding programs and projects that address these priorities. Further, the Philadelphia UAWG emphasizes regional partnership and collaboration, with some projects involving up to four states and eleven counties in the greater Delaware Valley region. The project I want to highlight involves the development of a multi-state, multi-county interoperable communications network, known as SECOM Net. Since 2002, the Philadelphia UAWG has invested over \$20 million to build and enhance interoperable communications capabilities. SECOM Net allows eleven counties in four states to communicate on a secure microwave network. This communication can occur between 911 Centers, Emergency Operations Centers, or person-to-person on the scene of an emergency, through the microwave network that patches together existing radio systems. Currently, SECOM Net is integrating the communication networks of university police departments and port partners. Future plans for SECOM Net include a capability to transmit data in addition to voice. The value of SECOM Net is not just in the technology that has been purchased, but also the governance structure that the Interoperable Communications Workgroup has established to plan for, manage, and maintain the network. It is an example how

thoughtful planning coupled with funding to resource what is needed can lead to improved preparedness.

In conclusion, solely examining GPD and its role in the grant-making process can create the false impression that tweaking one cog in the wheel will enable the Nation is to better counter threats and respond to emergencies. As I have described above, the nature of homeland security grants is complex and requires coordination beyond DHS to include other Federal departments, the SAAs and the applicants themselves.

Likewise, central management is not the enemy. Centralized management can be enhanced by closely connecting regional involvement to the grant-making process.

Lastly, the revision to the maintenance and calibration policy is an example of how GPD can effectively respond to the concerns of applicants while remaining careful stewards of taxpayer dollars. The environmental and historic preservation policy is an example of where more needs to be done to balance those needs. M&A is a valuable tool that allows grantees to focus on work rather than paperwork. A more stable funding process tailored for projects that span multiple grant periods would allow applicants to think more strategically about how and what is funded.

Once again thank you for the opportunity to testify, I am happy to answer any questions you may have

Follow-up Address

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